

1 Honorable James L. Robart
2
3
4
5
6
7
8
9

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10 Jemal Hussen TURA, an individual, and
11 Damtew Assefa WOLDEGIORGIS, an
individual,

12 Plaintiffs,
13
14 V
15 UNITED STATES DEPARTMENT OF
HOMELAND SECURITY("DHS"), *et al.*,
16
17 Defendants.

NO. C19-1131 JLR

STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND RESPONSE
DEADLINE

18
19 Stipulation

20 The parties have conferred and stipulate and agree as follows. Defendants' Response
21 is presently due on October 1, 2019. The parties jointly request that Defendants' Response
22 deadline be extended by 60 days until December 2, 2019. Plaintiff Tura seeks to compel
23 Defendants to complete processing of his Form I-485, Application to Adjust Status to Lawful
24 Permanent Resident. Plaintiff Woldergiorgis seeks to compel Defendants to complete
25 processing of his Form I-589, Application for Asylum. Good cause for an extension exists
26 in light of ongoing adjudication of Plaintiffs' applications, the results of which will impact
27 upon the course of this litigation or render these proceedings moot.
28

STIPULATION AND PROPOSED ORDER TO EXTEND RESPONSE
DEADLINE- 1
No. C19-1131 JLR

UNITED STATES ATTORNEY
1201 PACIFIC AVENUE, SUITE 700
TACOMA, WASHINGTON 98402
(253) 428-3800

1 Respectfully submitted and presented this 16th day of September, 2019.
2
3
4
5
6

BRIAN T. MORAN
United States Attorney

7 */s/ Jay W. Gairson*
8 JAY W. GAIRSON, WSBA #43365
9 Gairson Law, LLC
10 4606 Martin Luther King Jr. Way S.
11 Seattle, WA 98108
12 206-357-4218
13 Email: jay@gairson.com

14 Attorney for Plaintiffs

/s/ Patricia D. Gugin
PATRICIA D. GUGIN, WSBA # 43458
Assistant United States Attorney
United States Attorney's Office
1201 Pacific Avenue, Suite 700
Tacoma, Washington 98402
Phone: 253-428-3832
Fax: 253-428-3826
E-mail: pat.gugin@usdoj.gov

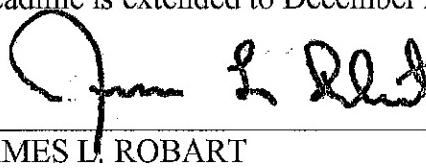
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Attorneys for Defendants

II. ORDER

It is so ORDERED. Defendants' Response deadline is extended to December 2, 2019.

Dated September 17, 2019.


JAMES L. ROBART
United States District Judge

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he/she is an employee/contractor in the Office of the United States Attorney for the Western District of Washington and is a person of such age and discretion as to be competent to serve papers.

It is further certified that, on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participant(s):

Jay W. Gairson
Email: jay@gairson.com

I further certify that on this date, I mailed by United States Postal Service the foregoing to the following non-CM/ECF participant(s)/CM/ECF participant(s), addressed as follows:

-0-

DATED this 16th day of September, 2019

s/ Rebecca L. Clauson
REBECCA L. CLAUSON
Legal Assistant
United States Attorney's Office
1201 Pacific Ave., Ste. 700
Tacoma, WA 98402
Phone: 253-428-3800
Fax: 253-428-3826
E-mail: rebecca.clauson@usdoj.gov